

JASON M. FRIERSON
United States Attorney
Nevada Bar No. 7709

DAVID PRIDDY, ILSBN 6313767
Special Assistant United States Attorney
Office of the General Counsel
Social Security Administration
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (510) 970-4801
Facsimile: (415) 744-0134
E-Mail: David.Priddy@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SUZZANNE MICHAELS,

Plaintiff,

v.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01262-DJA

**STIPULATION TO VOLUNTARY
REMAND PURSUANT TO SENTENCE
FOUR OF 42 U.S.C. § 405(g) AND TO
ENTRY OF JUDGMENT FOR
PLAINTIFF**

IT IS HEREBY STIPULATED by and between the parties, through their undersigned attorneys, and with the approval of the Court, that this action be remanded for further administrative action pursuant to the Social Security Act § 205(g), as amended, 42 U.S.C. § 405(g), sentence four.

On remand, the Appeals Council will remand the case to an administrative law judge (ALJ) for a new decision. The ALJ will further develop the record as necessary, offer Plaintiff the opportunity for a new hearing, and issue a new decision. The remand proceedings will be conducted consistent

1 with agency policy, including Hearings, Appeals, and Litigation Law Manual (HALLEX) I-4-5-5.

2 The parties further request that the Clerk of the Court be directed to enter a final judgment in
3 favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner.

4
5 Dated: January 19, 2023

Respectfully submitted,

6 LAW OFFICES OF CHARLES E. BINDER AND HARRY J.
7 BINDER, LLP

8 /s/ Daniel S. Jones

DANIEL S. JONES

(*as authorized via email on January 17, 2023)

9 Attorney for Plaintiff

10
11 Dated: January 19, 2023

Respectfully submitted,

12 JASON M. FRIERSON
13 United States Attorney

14 /s/ David Priddy

DAVID PRIDDY

Special Assistant United States Attorney

15 Attorneys for Defendant

16
17
18 IT IS SO ORDERED:

19 
20 HON. DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE

21
22 DATED: January 20, 2023

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Hal Taylor
2551 W. Lakeridge Shores
Reno, NV 89519
775-825-2223
Fax: 775-329-1113
Email: haltaylorlawyer@gbis.com

Daniel S. Jones
Law Offices of Charles E. Binder and Harry J. Binder, LLP
485 Madison Ave
Suite 501
New York, NY 10022
212-667-6801
Email: fedcourt@binderlawfirm.com

Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 19, 2023

/s/ David Priddy
DAVID PRIDDY
Special Assistant United States Attorney